



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MEMORANDUM:

To: Sam Borries, OSC

From: Peter Ramanauskas, Regional PCB
Coordinator, RRB, LCD

A handwritten signature in black ink, appearing to be "PR", written over the name Peter Ramanauskas.

Date: September 12, 2011

RE: Toxic Substances Control Act (TSCA) ARARS Review and concurrence on a Time-Critical Removal Action at the Portage Creek Area of the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site located in Kalamazoo, Kalamazoo County, Michigan

Based on our review of the information you provided regarding the time-critical removal of Polychlorinated Biphenyl (PCB) contaminated material from the Portage Creek Area of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (site), the TSCA PCB Remedial Program finds that the proposed removal action will not pose an unreasonable risk of injury to health or the environment and concurs with the response action for the Portage Creek Area. The TSCA PCB Remedial Program's determination is based on its review of the June 14, 2011 memo requesting approval for the time-critical removal action from Superfund to the Office of Solid Waste and Emergency Response and the April 14, 2011 Fields Group documents regarding Portage Creek remediation volume and mass estimates and the core displays of PCB concentrations.

The PCB cleanup standard established for the Portage Creek Area removal action is estimated to remove approximately 17,000 cubic yards of sediments, riverbank soil and floodplain soils containing approximately 2,123 pounds of PCB within a 1.8 mile section of the Creek. The TSCA PCB Remedial Program acknowledges that reasonable efforts will be made to achieve a 1 ppm performance goal for sediments by excavating 6 inches below a "neat line" representing an elevation where sampling data indicates a PCB concentration at or below 10 ppm. If confirmatory sampling demonstrates that the 1 ppm performance goal has not been met, the Superfund Program will determine whether to excavate additional sediment or cover it with clean material. The performance goal for riverbank and floodplain soils is 5 ppm. If confirmatory sampling demonstrates that the performance goal has not been met, the Superfund Program will determine whether to excavate additional material or cover it with clean material.

Additional response actions include monitoring, water treatment, stabilization, off-site disposal of excavated materials and backfilling dredged/excavated areas with clean topsoil and material. The PCB contaminated material with a PCB concentration greater or equal to 50 ppm will be disposed of in a chemical waste landfill that is in compliance with all state and federal regulatory requirements. PCB contaminated material less than 50 ppm will be disposed in a licensed and permitted commercial landfill that in compliance with all state and local laws. The facility that accepts the PCB material below 50 ppm must be a RCRA subtitle D facility whose permit allows it to accept PCBs.

Subsequent to the removal and as part of the remedial investigation (RI/FS) and the Record of Decision (ROD) for the entire site, Superfund will evaluate any residual risk to human health and the environment in the Portage Creek Area and determine whether additional response actions are necessary. Once your program has reached the RI/FS and the ROD phase of the project, we ask to be included in the review of the information regarding the Portage Creek Area. If you have any questions, regarding this concurrence, please do not hesitate to contact Jean Greensley at (312) 353-1171.